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REMARKS/ARGUMENTS

As more fully set forth below, applicants assert that all issues with the application have been resolve. Applicants respectfully request a notice of allowance of the claims.

I.   Examiner Interviews

Applicants' attorney held two formal interviews with Examiner Laurie Ries and Primary Examiner William Bashore regarding the declaration in the matter. Applicants attorney also held several other informal interviews with Examiner Ries regarding the sufficiency of the declaration. Applicants believe that any insufficiencies in the evidence associated with the declaration have now been resolved as is more fully set forth in Part II of this paper.

II.   Declaration and Supporting Evidence Submitted Herewith

The declaration and supporting evidence filed on May 22, 2006 was found ineffective to overcome the reference by Microsoft Corporation, "Draft: Discovery of Web Services (DISCO). In light of several interviews with Examiner Ries and Primary Examiner Bashore, applicants submit that the declaration and supporting evidence submitted herewith are effective to overcome the DISCO reference.

Appendix A includes a final version of the DISCO document. The declaration indicates that the subject matter of the final version of the DISCO document was derived from the inventors. Appendix B includes an email thread dated July 7, 2000. The email thread includes a link to an internally updated version of DISCO Document. Appendix C includes a printout of the document associated with the link in the email thread. The declaration indicates that the subject matter of the DISCO document associated with the link was derived from the inventors. Appendix D is a printout of the source code of the internally updated version of the DISCO document associated with the link. The declaration indicates that page 1 of the source code identifies the author as "<erikc>." The declaration also indicates that the alias "erikc" is the internal Microsoft alias for Erik Christensen.

Applicants assert that the declaration and supporting evidence overcomes any assertions in the Office Action. The Office Action contends that the previously submitted evidence does

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not support that Erik Christensen was an author of the original DISCO document. The source
code of the document in combination with the current declaration overcomes this contention in
that the source code identifies Erik Christensen as the author. The declaration also includes a
single declaration signed by the inventors. Also, the issue with Sara Williams has been
discussed in detail with both Examiner Ries and Primary Examiner Bashore. An agreement was
reached that further evidence is not required for Sara Williams in that the currently submitted
declaration and evidence remedies any issue with her name in the email chain. Accordingly,
applicants assert that the declaration and evidence submitted herewith are effective to overcome
the DISCO document.

III.   Rejection of Claims 1-19 under 35 U.S.C. 102(a) in view of DISCO

Claims 1-19 are rejected under 35 U.S.C. 102(a) as being anticipated by the DISCO
document. As set forth in the declaration, applicants assert that the rejection has been traversed.

IV.   Rejection of Claims 20-22 under 35 U.S.C. 103(a) in view of DISCO

Claims 20-22 are rejected under 35 U.S.C. 103(a) as being unpatentable over the DISCO
document. As set forth in the declaration, applicants assert that the rejection has been traversed.

V.   Rejection of Claims 1, 10-14, 16-17, and 20 under 35 U.S.C. 103(a)

Claims 1, 10-14, 16-17, and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable
over U.S. Patent No. 6,631,496 issued to Li (hereinafter "Li") in view of U.S. Patent No.
6,571,248 issued to Kusama (hereinafter "Kusama"). Applicants respectfully disagree with the
rejection. There is no suggestion in either of the references that they can be combined in the
manner propounded. The proposed combination would not be operative. Li teaches generating
records for bookmarked URLs. *Li* at col. 5, lines 35-36. The records include metadata. *Li* at col.
5, lines 36-37. The metadata is maintained in a distributed system to help enhance webpage
retrieval in a distributed system. The metadata is collected to track the users actions with regard
to webpages. Kusama is not related to this endeavor. Kusama pertains to appending metadata to
binary data. *Kusama*, at Abstract. The portion cited in the office action pertains to synthesizing

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binary data and metadata. *Kusama*, at col. 11, lines 66-67. Kusama teaches changing, adding, and reordering metadata within the synthesis. Not only is Kusama unrelated to Li, but the proposed combination would render Li inoperative. Synthesizing the metadata of Li with binary data would render Li inoperative because it is the metadata that is relevant in Li, not a synthesis of the metadata and binary data. Also, any reordering or extraction of the synthesized metadata would further render Li inoperative in that the actual structure of the metadata in Li is what is telling to the user. Accordingly, applicants assert that the proposed combination would be detrimental.

Moreover, applicants assert that the proposed combination of elements fails to teach all the features of the independent claims. Independent claim 1 includes the following combination of features not taught or suggested by the cited references:

issuing a request for the first resource identified by the first identifier;

parsing a response document received in response to the issued request, wherein the *response document includes an indication that the metadata exists within a second resource identified by a second identifier*, the indication identifying the metadata format;

generating *a request to retrieve the metadata from the second resource*, wherein the generated request is formatted to support the metadata format identified by the indication; and

retrieving the metadata from the second resource.

Applicants assert that the references do not teach or suggest the above combination of features. Contrary to the assertions in the Office Action, Li teaches navigating the bookmarks. The "links" taught in Li relate to other documents. There is no teaching in Li of requesting metadata from any of the linked documents as asserted. Furthermore, Kusama does not remedy this deficiency. The portion cited in the office action pertains to synthesizing binary data and metadata. *Kusama*, at col. 11, lines 66-67. Kusama teaches changing, adding, and reordering metadata within the synthesis. There is no teaching in either of the references that a "response document includes an indication that metadata exists within a second resource identified by a second identifier." Also, applicants can find no teaching of a "request to retrieve the metadata

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from the second resource." In this light, the proposed combination cannot possibly teach

"retrieving the metadata from the second resource." Accordingly, applicants assert that claim 1

is allowable over the references.

Independent claim 11 includes the following combination of features not taught or

suggested by the cited references:

> "the discovery document comprises metadata about a resource stored at a first
> location identified by a first identifier, and *a typed link indicating the existence
> of further metadata about the resource, wherein the typed link identifies the
> metadata format*; and"

> "*the data structure is stored at a second location identified by a second
> identifier, wherein the metadata is retrieved from the second location in
> response to a request, and further wherein the request is formatted to support
> the metadata format identified by the typed link.*"

Applicants assert that the references do not teach or suggest the above combination of

features. Contrary to the assertions in the Office Action, Li teaches navigating the bookmarks.

The "links" taught in Li relate to other documents. There is no teaching in Li of requesting

metadata from any of the linked documents as asserted. Furthermore, Kusama does not remedy

this deficiency. The portion cited in the office action pertains to synthesizing binary data and

metadata. *Kusama*, at col. 11, lines 66-67. Kusama teaches changing, adding, and reordering

metadata within the synthesis. There is no teaching in either of the references of a "typed link

indicating the existence of further metadata about the resource, wherein the typed link identifies

the metadata format" Also, applicants can find no teaching that the "data structure is stored at a

second location identified by a second identifier." In this light, the proposed combination cannot

possibly teach "wherein the metadata is retrieved from the second location in response to a

request, and further wherein the request is formatted to support the metadata format identified by

the typed link." Accordingly, applicants assert that claim 11 is allowable over the references.

Independent claim 17 includes the following combination of features not taught or

suggested by the cited references:

> the response document is issued in response to a request for a resource at a first
> location,

the response document includes *an indication that metadata exists at a second location that is different from the first location,*

the *indication identifies the metadata format,*

a request to retrieve the metadata from the second resource is issued, and

the request to retrieve the metadata *is formatted to support the metadata format identified by the indication.*

Applicants assert that the references do not teach or suggest the above combination of features. Contrary to the assertions in the Office Action, Li teaches navigating the bookmarks. The "links" taught in Li relate to other documents. There is no teaching in Li of requesting metadata from any of the linked documents as asserted. Furthermore, Kusama does not remedy this deficiency. The portion cited in the office action pertains to synthesizing binary data and metadata. *Kusama,* at col. 11, lines 66-67. Kusama teaches changing, adding, and reordering metadata within the synthesis. There is no teaching in either of the references of "the response document includes an indication that metadata exists at a second location that is different from the first location" and that "the indication identifies the metadata format." Also, applicants can find no teaching that a "request to retrieve the metadata from the second resource is issued." In this light, the proposed combination cannot possibly teach that the "request to retrieve the metadata is formatted to support the metadata format identified by the indication." Accordingly, applicants assert that claim 17 is allowable over the references.

Independent claim 19 includes the following combination of features not taught or otherwise suggested by the cited references:

a *server computer* including a resource;

a *client computer* configured to issue a request for the resource and to receive information in response to the request; and

a response document based on the resource, *generated by the server,* and

including *an indication of the existence of a discovery document at a location different than the server computer,* the discovery document including metadata about the resource, wherein:

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the indication identifies the metadata format,

the client computer receives the response document including the indication of the discovery document,

the client *computer generates a request to retrieve the metadata from the discovery document*, and

the generated request is formatted to support the metadata format identified by the indication.

Applicants assert that the references do not teach or suggest the above combination of features. Applicants can find no teaching in the references of the interaction between the client computer, server computer and documents as recited in claim 19. Also, contrary to the assertions in the Office Action, Li teaches navigating the bookmarks. The "links" taught in Li relate to other documents. There is no teaching in Li of requesting metadata from any of the linked documents as asserted. Furthermore, Kusama does not remedy this deficiency. The portion cited in the office action pertains to synthesizing binary data and metadata. *Kusama*, at col. 11, lines 66-67. Kusama teaches changing, adding, and reordering metadata within the synthesis. There is no teaching in either of the references of "a client computer configured to issue a request" and "a response document based on the resource, generated by the server." There is also no teaching of "including an indication of the existence of a discovery document at a location different than the server computer." Accordingly, applicants assert that claim 19 is allowable over the references.

Regarding claims 10, 12-14, 16 and 20, those claims include features not taught or otherwise suggested by the cited references. Moreover, those claims ultimately depend from independent claims 1, 11, 17 and 19, respectively. As such, they are thought allowable for at least the same reasons set forth above.

VI.   Rejection of Claims 2-9, 15, 18-19 and 21-22 under 35 U.S.C. 103(a)

Claims 2-9, 18 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Li in view of Kusama and further in view of U.S. Patent No. 6,651,059 issued to Sundaresan (hereinafter "Sundaresan"). Claims 15, 19, and 21 are rejected under 35 U.S.C. 103(a) as being

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unpatentable over Li in view of Kusama and further in view of U.S. Publication No. 2002/0103829 published to Manning (hereinafter "Manning). Applicants respectfully disagree with the rejection. Applicant assert that the references are not combinable in the manner propounded. Furthermore, the rejection depends from the rejection above in Part V of this paper. As such, the claims are thought allowable for at least the same reasons set forth above.

VII.   Request For Reconsideration

In view of the foregoing remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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